

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**UNITED STATES OF AMERICA**

**PLAINTIFF**

**vs.**

**CRIMINAL NO. 3:15-cr-00067 HTW-FKB**

**IRB BENJAMIN**

**DEFENDANT**

**UNOPPOSED MOTION FOR CONTINUANCE**

COMES NOW IRB BENJAMIN, Defendant herein, by and through undersigned counsel, and files this his Motion to Continue the Trial of this case and all corresponding deadlines, and in support thereof would show unto the Court the following:

1. That this case is presently set for trial on Tuesday, July 5, 2016 at 9:00 a.m., in the United States District Court in Jackson, Mississippi.

2. That this case is complex and the different counts of this indictment allege conduct involving contractual dealings among a number of counties and business entities, and spans a period of over 4 years. That counsel for the Defendant is in need of additional time to obtain and review additional discovery materials which have recently been disclosed; to conduct further investigation into the facts of the case with respect to the application of the Sentencing Guidelines; and to otherwise conduct legal research into these same issues.

3. That as of the date of the filing of this motion, counsel for the Defendant continues to pursue plea negotiations and is conferring with the government diligently in an effort to resolve this case but is in need of additional time.

4. That counsel is advised by the attorney for the government that there is no objection to the relief requested by this motion on the part of the government.

5. That the Defendant expressly waives his right to a speedy trial herein.

Based on the foregoing, counsel submits that by granting this motion, the ends of justice are served in that the right of the Defendant to a fair trial outweighs the public's right to a speedy trial.

WHEREFORE, PREMISES CONSIDERED, counsel for the Defendant Irb Benjamin respectfully moves this Honorable Court to enter an order continuing the trial of this case from Tuesday, July 5, 2016, as well as the applicable deadlines.

RESPECTFULLY SUBMITTED, this the 22<sup>nd</sup> day of June, 2016.

/s/ Joe M. Hollomon  
JOE M. HOLLOMON, ATTORNEY FOR  
AND ON BEHALF OF IRB BENJAMIN

OF COUNSEL:

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**CERTIFICATE OF SERVICE**

I, Joe M. Hollomon, do hereby certify that I have this date electronically filed the foregoing *Unopposed Motion for Continuance* with the Clerk of the Court using the Electronic Case Filing (ECF) system, which sent notification of such filing to all counsel of record.

THIS, the 22<sup>nd</sup> day of June, 2016.

/s/ Joe M. Hollomon  
JOE M. HOLLOMON, ESQ.